

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)	
IMPLANT PRODUCTS LIABILITY)	MDL NO. 2272
LITIGATION)	
)	
This Document Relates to All Cases)	Master Docket Case No. 1:11-cv-05468
)	
)	Honorable Rebecca Pallmeyer

**AGREED MOTION TO APPROVE AND ENTER
REVISED CASE MANAGEMENT ORDER NO. 2**

The defendants, Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Orthopaedic Surgical Products, Inc., Wilson/Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., Zimmer Surgical, Inc., and Zimmer US, Inc. (collectively "Defendants"), move this Court to approve and enter proposed revised Case Management Order No. 2 ("CMO No. 2"), attached hereto and agreed upon by the Parties. In support thereof, Defendants state:

1. Attached as Exhibit 1 is revised CMO No. 2 with its Exhibit A, Plaintiff Fact Sheet ("PFS"), and its Exhibit B, medical records authorization. The terms of CMO No. 2 and both Exhibits A and B have been agreed upon by the parties following substantial negotiation.

2. CMO No. 2 and the PFS conform to this Court's December 19, 2011, Order, and include additional compromises reached by counsel for the plaintiffs, James Ronca, and counsel for Defendants, Andrea Roberts Pierson, on December 21, 2011.

WHEREFORE, Defendants respectfully move the Court for approval and entry of proposed revised Case Management Order No. 2, including its attachments.

BAKER & DANIELS LLP

/s/ Andrea Roberts Pierson

Joseph H. Yeager, Jr. (Ind. State Bar #2083-49)
Andrea Roberts Pierson (Ind. State Bar #18435-49-A)
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
Telephone: (317) 237-0300
Fax: (317) 237-1000
Email: jay.yeager@bakerd.com
andrea.pierson@bakerd.com

Attorneys for Zimmer, Inc., Zimmer Holdings, Inc.,
Zimmer Orthopaedic Surgical Products, Inc., Wilson/
Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips,
Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State
(incorrectly named as (1) Zimmer Tri-State d/b/a Tri-
State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer,
Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State
Orthopedic), K. Michael Melia, d/b/a Zimmer Melia &
Associates, Inc. (incorrectly named as Zimmer Melia &
Associates, Inc.), Zimmer Orthobiologics, Inc., Zimmer
Surgical, Inc., and Zimmer US, Inc.

CERTIFICATE OF SERVICE

I certify that on December 21, 2011, a copy of the foregoing *Agreed Motion To Approve and Enter Revised Case Management Order No. 2* was filed electronically. Parties may access this filing through the Court's ECF/CFM system. I further certify that on December 21, 2011, a copy of this document was served by first-class United States mail, postage prepaid, upon the following:

Gregory T. Mueller
Frank & Mueller, LLC
308 North 21st Street, Suite 401
St. Louis, MO 63103

Shannon Lukei
Robinson, Calcagnie, Robinson, Shapiro & Davis
620 Newport Center Drive Suite 700
Newport Beach, CA 92660

/s/ Andrea Roberts Pierson